

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, ET AL.
Plaintiffs

VS.

C.A. NO. 04-312/L

JEFFREY DERDERIAN, ET AL.
Defendants

**NOTICE OF MOTION AND MOTION FOR
ADMISSION *PRO HAC VICE* OF ANN M. SONGER**

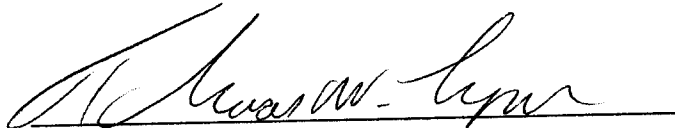
PLEASE TAKE NOTICE that Leggett & Platt Incorporated and L&P Financial Services Co. hereby move before the Hon. Ronald R. Lagueux, U.S.D.J., at the United States District Court for the District of Rhode Island, Providence, Rhode Island, for an Order to have Ann M. Songer, Esq. admitted to this Court to appear *Pro Hac Vice* on behalf of defendants, Leggett & Platt Incorporated and L&P Financial Services Co., in the above action; and

Defendants, Leggett & Platt Incorporated and L&P Financial Services Co. shall rely upon the Affidavits of Thomas Lyons, Esq. and Ann M. Songer submitted herewith; and

A proposed form of Order is also submitted herewith; and

Defendants, Leggett & Platt Incorporated and L&P Financial Services Co. waive oral argument on the return date of this motion and submits same for a ruling on the papers.

Respectfully submitted,



Thomas W. Lyons, Esquire
STRAUSS, FACTOR, LAING & LYONS
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CERTIFICATION

I hereby certify that on this 13th day of October, 2004, a copy of the within was mailed to counsel of record as set forth on the attached certificate of service by regular mail, postage prepaid.

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UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, ET AL.
Plaintiffs

VS.

C.A. NO. 04-312/L

JEFFREY DERDERIAN, ET AL.
Defendants

**AFFIDAVIT IN SUPPORT OF MOTION
FOR LEAVE TO APPEAR *PRO HAC VICE***

Ann M. Songer, being duly sworn deposes and says:

1. I am a partner in the law firm of Shook, Hardy & Bacon, Kansas City, Missouri and make this Affidavit in support of my Motion for Admission Pro Hac Vice to appear for defendants, Leggett & Platt Incorporated and L&P Financial Services Co. in the above matter.
2. I am a member of the State bars of Missouri (1994) and Kansas (1996).
3. I am admitted to the following United States District Courts: Western District of Missouri (1994) and the District of Kansas (1998).
4. I am also admitted to the Eighth Circuit Court of Appeals (2000).
5. I am a member of the bar in good standing of all the aforementioned courts.
6. There are no disciplinary proceedings pending against me as a member of the bar of any jurisdiction.
7. I have not been admitted pro hac vice in any other matter pending in this court in the preceding 24 months.
8. Shook, Hardy & Bacon, LLP has represented Leggett & Platt Incorporated and L&P Financial Services Co. for more than 10 years and has appeared on its behalf in litigation throughout the United States before United States District and state courts.

9. In addition to my familiarity with the law in this area, I am aware of the industry practices and the business methods of Leggett & Platt Incorporated and L&P Financial Services Co. I am also aware of the previous business relationship of Leggett & Platt Incorporated and L&P Financial Services Co. and its customers.

10. In view of the foregoing, Leggett & Platt Incorporated and L&P Financial Services Co. have requested that I represent them in this action now pending in the United States District Court for the District of Rhode Island.

11. My co-counsel for this action is Thomas Lyons of the law firm of Strauss, Factor, Laing & Lyons, and he is qualified to practice before the United States District Court for the District of Rhode Island.

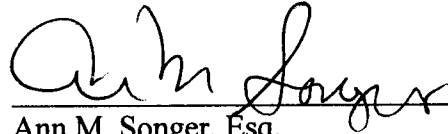
12. I have reviewed and shall comply with the Local Rules of the District of Rhode Island including, without limitation, all applicable disciplinary rules, and, specifically Rule 5(c) of the Local Rules.

13. Based on the foregoing, I request that I be specially admitted to the bar of the United States District Court for the District of Rhode Island for the purpose of representing Leggett & Platt Incorporated and L&P Financial Services Co. in the instant litigation.

14. I declare under penalty of perjury that the foregoing is true and accurate.

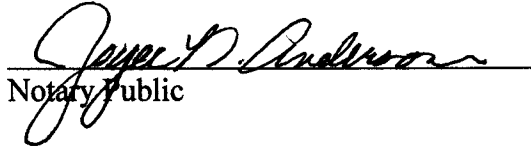
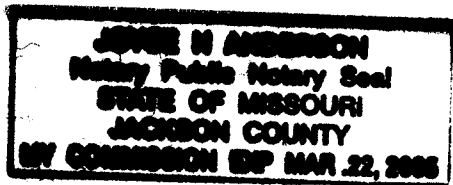
DATED:

Kansas City, Missouri



Ann M. Songer, Esq.
Shook, Hardy & Bacon, LLP
One Kansas City Place
1200 Main Street
Kansas City, MO 64105-2118
Tel.: 816-474-6550
Fax: 816-421-5774

Sworn to before me this
27th day of September, 2004.


Notary Public

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, ET AL.
Plaintiffs

VS.

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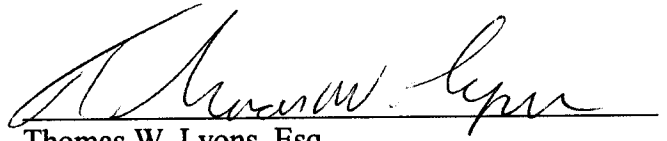
**AFFIDAVIT OF THOMAS LYONS, ESQ. IN
SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE OF ANN M. SONGER, ESQ.**

Thomas Lyons, Esq., being duly sworn deposes and says:

1. I am an attorney at law and partner with the law firm of Strauss, Factor, Laing & Lyons, with offices at 222 Richmond Street, Suite 208, Providence, Rhode Island.
2. Pursuant to Local Rule 5 of the Rules of the United States District Court for the District of Rhode Island, I submit this affidavit in support of the request of the defendants, Leggett & Platt Incorporated and L&P Financial Services Co. , for an Order permitting Ann M. Songer, Esq. of the law firm of Shook, Hardy & Bacon, LLP to appear *pro hac vice* on behalf of Leggett & Platt Incorporated and L&P Financial Services Co. in the above-captioned matter.
3. I am the attorney at Strauss, Factor, Laing & Lyons who is responsible for the handling of this matter on behalf of Leggett & Platt Incorporated and L&P Financial Services Co. I hereby agree to supervise the conduct of Ms. Songer as required under the Rules of the Court and any additional requirements which may be imposed by the Judge, to which this action is assigned.
4. Wherefore, Leggett & Platt Incorporated and L&P Financial Services Co. respectfully requests that this Honorable Court enter an Order permitting Ann M. Songer of the law firm of Shook, Hardy & Bacon, LLP, to appear *pro hac vice* on its behalf in connection with the above-captioned matter.


DATED:

Providence, Rhode Island



Thomas W. Lyons, Esq.
Strauss, Factor, Laing & Lyons
222 Richmond Street, Suite 208
Providence, RI 02903
Tel.: 401-456-0704
Fax: 401-421-4730

Sworn to before me this
4th day of October, 2004.


Notary Public